

any of the plaintiffs' rights under the Federal or New York Constitutions or Statutes had been violated.

A review of the officer's Central Personnel Index (CPI) revealed the following:

1. On February 9, 1996, Detective DeJesus had a substantiated departmental investigation for being out of command and patrol unauthorized by any supervisor of the command. He received a B command discipline and lost 10 vacation days;
2. On November 19, 2012, a substantiated departmental investigation found that Det. DeJesus had an incomplete memobook and was issued a B command discipline;
3. On April 5, 2011, Detective Jesus had a substantiated departmental investigation for improper off-duty employment. [discipline]

A review of the officer's CCRB history revealed the following:

1. In May 2015, had a CCRB substantiated complaint, where departmental charges were brought against DeJesus for an improper premise search. Det. DeJesus pled nolo contendere to the allegations and received verbal instructions.
2. [REDACTED]

The People reserve the right to move *in limine* to preclude reference to this information, or otherwise to object to its use or introduction into evidence during trial.

Should you wish to discuss this matter, please do not hesitate to call me at [REDACTED] [REDACTED] Ext.] during office hours.

Sincerely,

[REDACTED]
[REDACTED]

cc: Clerk of the Court